

Steven M. Goldsobel (State Bar No. 166405)
Katherine A. Bowles (State Bar No. 287426)
Law Offices of Steven Goldsobel,
A Professional Corporation
1901 Avenue of the Stars, Suite 1750
Los Angeles, CA 90067
Tel: (310) 552-4848
Fax: (310) 695-3860
Email: steve@sgoldsobel.com

Attorney for Defendant
HOOTAN MELAMED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HOOTAN MELAMED (1),

Defendant.

CASE NO. 16CR1409H

**UNOPPOSED MOTION
AUTHORIZING TRAVEL FOR
DEFENDANT HOOTAN
MELAMED DURING PRETRIAL
RELEASE**

[[PROPOSED] ORDER LODGED
CONCURRENTLY HEREWITH]

Defendant Hootan Melamed ("Melamed"), by and through his counsel of record, Steven M. Goldsobel, hereby brings this Unopposed Motion for Travel During Pretrial Release.

1. On June 16, 2016, Melamed was indicted in *United States v. Melamed, et al.*, Case No. 16CR1409H, and, currently, he is on pretrial release. Melamed currently is authorized to travel throughout the State of California.

2. Melamed wishes to travel from Los Angeles, California to Kapalua, Maui, Hawaii from September 2, 2016 through September 6, 2016, for vacation.

3. Assistant United States Attorney Valerie H. Chu ("Ms. Chu") does not oppose Melamed traveling to Kapalua, Maui, Hawaii from September 2, 2016 through September 6, 2016, so long as Melamed provides Ms. Chu and Pretrial Services with Melamed's itinerary before leaving and Melamed notifies Pretrial

Services of Melamed's departure from and return to Los Angeles, California.
Pretrial Services does not oppose Melamed traveling to Kapalua, Maui, Hawaii
from September 2, 2016 through September 6, 2016.

4. Accordingly, Melamed respectfully requests that the Court enter an
order authorizing Melamed to travel from Los Angeles, California to Melamed
traveling to Kapalua, Maui, Hawaii from September 2, 2016 through September 6,
2016.

Dated: August 26, 2016

Respectfully submitted,

LAW OFFICES OF STEVEN GOLDSOBEL
A PROFESSIONAL CORPORATION

By: /s/ Steven M. Goldsobel
STEVEN M. GOLDSOBEL
Attorney for Defendant Hootan Melamed

Dated: August 26, 2016

LAURA E. DUFFY
UNITED STATES ATTORNEY

By: /s/ Valerie H. Chu
Valerie H. Chu
Assistant United States Attorney
Attorney for Plaintiff
United States of America

///

///

Dated: August 26, 2016

DAMION DAVIS
PRETRIAL SERVICES OFFICER

By: /s/ Damion Davis

Damion Davis
Pretrial Services Officer
United States District Court for the Central
District of California

Dated: August 26, 2016

SABRINA HALL
PRETRIAL SERVICES OFFICER

By: /s/ Sabrina Hall

Sabrina Hall
Pretrial Services Officer
United States District Court for the Southern
District of California

NOTICES OF ACKNOWLEDGMENT

I, Hootan Melamed, hereby acknowledge that, in connection with my request for travel to Kapalua, Maui, Hawaii, I need to provide Ms. Chu and Officer Davis with my itinerary before leaving and I need to notify Officer Davis of my departure from and return to Los Angeles, California.

Dated: 8/26/16

Signed: 

Defendant Hootan Melamed

I, Houshang Melamed, hereby acknowledge and consent to Hootan Melamed's request to travel to Kapalua, Maui, Hawaii from September 2, 2016 through September 6, 2016.

Dated: 8/26/16

Signed: 

Surety Houshang Melamed

SIGNATURE CERTIFICATION

I hereby attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: August 26, 2016

/s/ Steven M. Goldsobel

Steven M. Goldsobel (State Bar No. 166405)
Katherine A. Bowles (State Bar No. 287426)
Law Offices of Steven Goldsobel,
A Professional Corporation
1901 Avenue of the Stars, Suite 1750
Los Angeles, CA 90067
Tel: (310) 552-4848
Fax: (310) 695-3860
Email: steve@sgoldsobel.com

Attorney for Defendant
HOOTAN MELAMED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

HOOTAN MELAMED (1),

Defendant.

CASE NO. 16CR1409H

PROOF OF SERVICE

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 1901 Avenue of the Stars, Suite 1750, Los Angeles, CA 90067.

On August 26, 2016, I served the foregoing document described as:

**UNOPPOSED MOTION AUTHORIZING TRAVEL FOR DEFENDANT
HOOTAN MELAMED DURING PRETRIAL RELEASE**

on the interested parties in this action by placing true copies thereof enclosed in a sealed envelope, addressed as follows:

Gerald M. Werksman, Sr.
Gerald M. Werksman, Esq.
17702 Mitchell North
Irvine, CA 92614
werksmanlaw@gmail.com
949-307-2426 p
949-756-9060 f
*Attorney for Defendant Jean
Francois Picard*

Patrick Q. Hall
Law Offices of Patrick Q. Hall
1350 Columbia Street, Suite 601
San Diego, CA 92101
pat@pqhlaw.com
619-268-4040 p
619-268-4041 f
Attorney for John Pangelinan

Thomas J. Warwick, Jr.
Grimes and Warwick
2664 Fourth Avenue
San Diego, CA 92103
twarwick@grimesandwarwick.com
619-232-0600 p
619-232-8857 f
Attorney for Phong Hung Tran

Gretchen C. VonHelms
Law Offices of Gretchen VonHelms
105 West F Street, Third Floor
San Diego, CA 92101
gvh@ronisandronis.com
619-239-1199 p
619-236-8820 f
Attorney for Jonathan Pena

Valerie Chu
U S Attorneys Office Southern
District of California
Criminal Division
880 Front Street, Room 6293
San Diego, CA 92101
Valerie.Chu@usdoj.gov
619-546-6750 p
619-546-0450 f
Attorney for USA

1
2 **[X] BY ELECTRONIC MAIL OR ELECTRONIC TRANSMISSION:**

3 Based on a court order or an agreement of the parties to accept service by e-
4 mail or electronic transmission, I caused the document to be sent to the respective e-
5 mail addresses of the parties. I did not receive, within a reasonable time after the
6 transmission, any electronic message or other indication that the transmission was
7 unsuccessful.

8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct.

10 Executed on August 26, 2016, at Los Angeles, California.

11 
12 _____
13 Samantha Carranza
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE